

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PATTY RATERMANN,

Plaintiff,

v.

PIERRE FABRE USA, INC., et al.,

Defendants.

Case No.: 1:22-cv-325-JMF

**NOTICE OF ACCEPTANCE OF RULE 68 OFFER; REQUEST FOR ENTRY OF JUDGMENT
THEREUPON**

**TO THE HONORABLE COURT, THE CLERK, ALL PARTIES, AND THEIR
ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Plaintiff, Patty Ratermann, pursuant to Rule 68 of the Federal Rules of Civil Procedure, hereby accepts the Offer of Judgment served by Defendant, Quickframe, Inc. (“Quickframe”), on February 18, 2025. A copy of the Offer of Judgment is attached hereto as **Exhibit A.**

The terms of the Offer of Judgment are that judgment is to be entered in Plaintiff’s favor and against QuickFrame for all of her claims in the amount of five thousand dollars (\$5,000.00), which is inclusive of Plaintiff’s costs and attorneys’ fees, and with this amount to be paid to Plaintiff by Quickframe.

Pursuant to Rule 68, Plaintiff requests that the Clerk enter judgment in accordance with the terms of the Offer of Judgment. Upon such entry, this case will be resolved in its entirety.


Dated: February 26, 2025
New York, New York

Respectfully submitted,

All conferences and the trial are canceled. All motions are moot. The Clerk of Court is directed to enter judgment consistent with the accepted offer, *see* ECF No. 193-1 — including the language disclaiming liability — to terminate all open motions, and to close the case.

By: /s/ Scott Alan Burroughs
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SO ORDERED.



February 27, 2025